

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN**

ABIEL OSORIO COTTO,
BENJAMIN OSORIO,
LUIS ENRIQUE CAMACHO MATTOS,
DAVID PAUL GAUTREAU,
JEREMY SANTOS RAMIREZ,
NORBERTO RIVERA FRESE,
RAFAEL ERNESTO PASTRANA LUGO,
and DAVID LAMBERT,

Plaintiffs,

v.

TJ SUTTON ENTERPRISES, LLC
d/b/a TJ SUTTON, LLC,
AECOM, INC., AECOM CARIBE, LLP,
CITADEL RECOVERY SERVICES, LLC,
BLUEWATER CONSTRUCTION, INC, d/b/a
BLUE WATER STAFFING COMPANY,
THOMAS J SUTTON,
CELESTINO A. WHITE, SR, d/b/a
CELESTINO WHITE CONSULTING &
MANAGEMENT FIRM,
LEONARD RAMSEY, and JANE DOE,
(landlord),

Defendants.

3:21-cv-00016

COMPLAINT FOR DAMAGES
AND DECLARATORY RELIEF

JURY TRIAL DEMANDED

NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that Aaron Halegua, Esq., *pro hac vice*, hereby enters his appearance as co-counsel for the Plaintiffs, and requests that copies of all correspondence, documents filed, and Orders in the above-captioned action be provided to him at his email address ah@aaronhalegua.com.

Dated: December 20, 2024

Respectfully submitted,

s/ Aaron Halegua

Aaron Halegua, Esq., *Pro Hac Vice*
524 Broadway, 11th Floor
New York, NY 10012
646-854-9061
ah@aaronhalegua.com

s/ Peter J. Lynch

Peter J. Lynch, Esq.
VI Bar No. 1256
Fuller & Lynch Advocacy Group, PLLC
FLAG LAW VI
PO Box 303300
St. Thomas, VI, 00803
(340) 201-5955 c
(340) 776-7801 o
(888) 481-4960 fax
pete@flaglawvi.com

Counsel for Plaintiffs

Certificate of Service

I hereby certify, under penalties of perjury, that on this 20th day of December, 2024, I filed the foregoing document with the DC/ECF system, which serves a copy on the below-listed counsel of record:

DUDLEY NEWMAN FEUERZEIG LLP
Attorneys for Citadel Recovery Services

Charles E. Lockwood, Esq.
Gregg R. Kronenberger, Esq.
V.I. Bar No. 1230
1131 King Street, Suite 204
Christiansted, St. Croix
U.S. Virgin Islands 00820-4971
(340) 773-3200 Telephone
(340) 773-3409 Facsimile
Email: clockwood@dnfvi.com
gkronenberger@dnfvi.com

BECKSTEDT & KUCZYNSKI LLP
Attorneys For AECOM & AECOM Caribe, LLP

Carl A. Beckstedt III, Esq. (VI Bar No. 684)
2162 Church Street
Christiansted, VI 00820
Tel: 340-719-8086
Fax: 800-886-6831
Email: carl@beckstedtlaw.com
amanda@beckstedtlaw.com

LAW OFFICES OF JENNIFER JONES
Counsel for Leonard Ramsey d/b/a Ramsey Hotel

Jennifer Jones, Esquire (V.I. Bar No. 686)
9003 Havensight Mall, Ste. 319
St. Thomas, VI 00802
(340) 779-7386 (Phone)
(340) 714-5080 (Facsimile)
Email: JJones@VIEnvironmentalLaw.com

MICHAEL L. SHEESLEY, P.C.
*Counsel for the Sutton Defendants
and Bluewater Construction, Inc.*

Michael L. Sheesley, Esq.
V.I. Bar #1010
Condo Torre Del Mar, Apt 2201
1477 Ashford Ave
San Juan, PR 00907
Telephone: (412)972-0412
Email: michael@sheesley-law.com

s/ Aaron Halegua
Aaron Halegua, Esq., *Pro Hac Vice*
524 Broadway, 11th Floor
New York, NY 10012
646-854-9061
ah@aaronhalegua.com